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Report Series 1991

91-8

AMO's Response To The Ministry of Environment Discussion Paper: TOWARDS A SUSTAINABLE WASTE MANAGEMENT SYSTEM

Association of Municipalities of Ontario
February 1991

MISSION STATEMENT

AMO unites Ontario's municipalities.

We take pride in promoting, supporting and enhancing strong and effective municipal government.

We provide strategic leadership by:

- developing and effectively promoting responsive quality policy;
- informing and educating governments, the media and the public;
- marketing innovative and beneficial services.

Our elected representatives, municipal officials and association staff form a team which values and respects:

- diversity and local autonomy;
- fairness and equity;
- consultation;
- consensus;
- co-operation.

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EXECUTIVE SUMMARY

The Ministry of Environment (MOE) released its discussion paper, Towards a Sustainable Waste Management System, in the summer of 1990. The paper called for a response to its plans to restructure municipal solid waste management systems so they would be more environmentally and financially sustainable.

When the provincial government changed in the fall of 1990, the status of the paper, which had been developed under the former government, was uncertain. However, on October 15, 1990, during a speech to the Recycling Council of Ontario's annual conference, the new Minister of the Environment, the Honourable Ruth Grier, asked interested parties to respond to the document to "help me and the Ministry develop and implement an effective agenda for waste management."

The Association of Municipalities of Ontario (AMO) has thus responded to this document even though its status as potential provincial policy is uncertain. AMO's response is based on existing AMO waste management policy and does not include a response to any initiatives or policies which the new Minister has introduced.

AMO's response has three sections. In the first section, AMO makes general comments about the MOE's paper, Towards a Sustainable Waste Management System. These ask for more information on general MOE statements. They also urge the province to: set forward its waste management agenda, begin to address the various concerns in this area, consult with municipalities on areas which will impact them in municipal solid waste management, and move toward regulations to enforce the progress it wishes to see in this area.

In the second section, AMO responds to specific topics which the MOE has raised in its document. This includes stating AMO's policies on the Blue Box, energy-from-waste, facility development, financial sustainability, the private sector, Ontario funding programs, Ontario's waste diversion targets, packaging, the planning and approvals process, the public's involvement, research and development, statutory authority, and waste producers.

In the final section, AMO makes very specific comments

about sections of, or comments in, the MOE's discussion paper. To provide the province with the best municipal response, these are very detailed and far-reaching.

In the conclusion to its response, AMO notes it appreciates the opportunity to comment on the Ministry of Environment's discussion paper, Towards a Sustainable Waste Management System. AMO also calls for closer co-operation between the province and municipalities so together they can most effectively address the province's waste management concerns.

1 INTRODUCTION

The Ministry of Environment (MOE) released its discussion paper, Towards a Sustainable Waste Management System, in the summer of 1990. The paper called for responses to its plans to restructure municipal solid waste management systems so they would be more environmentally and financially sustainable.

After the government changed in the fall, the Minister of Environment, the Honourable Ruth Grier, said in her speech to the Recycling Council of Ontario on October 15, 1990 that while the discussion paper had been developed under the Liberal administration, she would receive comments on the paper to "help me and the Ministry develop and implement an effective agenda for waste management."

Because of that comment, the Association of Municipalities of Ontario (AMO) is responding to this document even though its status as potential provincial policy is uncertain. AMO's response is based on existing AMO waste management policy.

The MOE's document was extremely repetitive, so AMO has structured this response to give AMO's comments to each subject area. Detailed comments about certain sections of the MOE's paper then follow.

AMO would also like it noted at this point that the provincial government has made many statements about waste management since the MOE's discussion paper was released. This response responds only to the discussion paper as presented by MOE and does not address any of the comments made, or policies announced, by the provincial government since the fall of 1990.

2 GENERAL COMMENTS

AMO has several general comments to make on the Ministry of Environment's (MOE) discussion paper, Towards a Sustainable Waste Management System. The following comments apply to the whole of this paper:

- The Ministry of the Environment refers to the "3Rs" of reduction, reuse and recycling, but does not include the fourth "R" of recovery of energy-from-waste. AMO's waste management policy is based on a "4Rs" waste minimization hierarchy which includes all four "Rs" and it urges the province to adopt this "4Rs" hierarchy.

  The province should promote reduction and reuse before recycling and be specific about how programs in these areas will work.

- Many of the statements in the MOE document are very general and municipalities need more specific information on them before they can offer further comment.

- Much of the document concentrates on what the province has done. More emphasis should be put on what the province plans to do in the waste management area.

- AMO would like the province to move from providing frameworks for waste management dialogues to addressing the problems.

- Municipalities should be consulted about the changes which impact them while these changes are still being planned and before they are introduced. This would apply to the province's work on revising legislation for new and existing waste management facilities, the changes to the Environmental Protection Act, and Regulation 309, but it would also apply to all other initiatives which impact municipal solid waste management.

- The province should move toward regulations to enforce the progress it wishes in this area, particularly for the areas noted in the section, "The 3Rs of Waste Management". It should provide more information on the regulation initiatives it would introduce if voluntary measures fail to achieve the desired results. Municipalities should be consulted and be part of the negotiations regarding these.

3 COMMENTS BY TOPIC

Throughout its paper, the Ministry of Environment refers to several topics repeatedly in different sections. AMO has chosen to make one response per topic.

3.1 Blue Box

- AMO has, on several occasions, pointed out to the province the insufficient provincial and private sector funding for the Blue Box recycling program. It has called for industry to take more responsibility for the waste it generates and it has asked for improved financial funding in this area.

- On page 12 of the MOE paper, the MOE has a Blue Box side-bar which indicates the Blue Box program is jointly funded by the municipality, Ministry of Environment and Ontario Multi-Multerial Recycling Inc. The province should make people aware this is only true for start-up costs. Municipalities receive some funding of operating costs from the province during the first five years of a program, then the program's long-term costs are paid by municipalities and their rate-payers.

- The province should ensure that the province and private sector provide long-term funding for the Blue Box recycling programs which they initiated. This funding should continue to be one-third of the total cost for each partner and should be available during the periods when revenue from selling recyclables fails to cover the costs of recycling programs.

- The province should recognize that storage is not an acceptable alternative to markets. The province should also do more - and in a much more aggressive manner than it has - to assist with the development of markets for recyclable materials.

- The province should release its study on markets for recyclable materials as soon as possible.

- Municipalities should be involved in any discussions or work to start further OMMRI-type activities, such as mentioned in the section, "The 3Rs of Waste Management".

3.2 Energy-From-Waste

- The province should clarify its stand on energy-from-waste so municipalities know whether it is, or is not, an acceptable waste management practice. So far, the Ministry of Environment has not approved energy-from-waste incineration, but the Ministry of Energy has a grant program for it. The province should issue a provincial, rather than ministerial, statement to clarify this area. The province should also develop regulations for this area which bind the Environmental Assessment Board.

- The province should also extend the energy-from-waste Capital Assistance Program's funding beyond 1992.

3.3 Facility Development

- Municipalities are spending much time, money and effort trying to develop waste management facilities. But these facilities are not being developed quickly enough to keep pace with the diminishing capacity of the existing system because the current approval process is completely unsatisfactory.

  For more examples of the difficulties municipalities have been experiencing, please see AMO's waste management report, The Waste Management Planning and Approvals Process, published in March 1989.

- In principle two of the section, "The Principles of a Sustainable Waste Management System", which appears on page nine of its document, the MOE says: "The design and operation of all waste management facilities in Ontario must comply with strict environmental standards to protect

human health and the environment."

AMO notes the MOE has missed many other aspects of the Environmental Assessment process which municipalities must address.

3.4 Financial Sustainability

Through its waste management reports, AMO is already in step with much of what is suggested in the MOE's paper. AMO has already urged municipalities to:

- include, in audits of their waste management systems, information which would provide them with a true cost accounting of their solid waste management system;
- set their tipping fees so these reflect the total life-cycle cost of their solid waste management systems;
- dedicate the revenue from tipping fees to fund their integrated waste management system.

In the section, "Municipal Solid Waste Management and Financing":

- some municipalities have begun to do full-cost accounting of their waste management systems. But, much more needs to be done in this area before this can become a universal practice. If the province is developing work in this area, municipalities would like to be involved as it will impact them.
- AMO agrees with establishing reserve funds. However, funds which plan for the future should include replacement and perpetual care costs.
- the province should provide more measures for the private sector because the ministry focuses primarily on householder-generated waste. The private sector should also be contributing its share to paying for this area. This is essential because industrial, commercial and institutional waste comprises about half of the solid waste stream in Ontario.

- the provincial government should acknowledge that a significant number of landfills, and thus the tipping fees generated from them, are not under the direct regulatory control of municipalities. They are controlled by private operators.

3.5 Private Sector
(industrial, commercial and institutional)

- The province should recognize that the private sector is not homogeneous as is intimated in this discussion paper.
- The province should define the role that private operators hold as receivers of waste.
- The private sector should conduct waste audits of its own operations to decrease the waste it generates. The province should ensure these audits are done.
- The private sector should be responsible for diverting the waste it creates.
- The private sector must share the cost and work of waste diversion - in recycling, waste reduction and reuse. Besides developing new initiatives in this area, it should also help to develop markets.
- The province should develop a plan to ensure that waste management is a priority activity for the private sector. The Manitoba government has developed a waste minimization plan which puts the onus of waste reduction on the private sector. The private sector will then have to submit action plans for reduction and diversion of waste to the province by a certain date.
- Besides looking for ways to reduce the amount of resources it uses in its products, the private sector should look at ways to improve product durability, reuse and repair. Products should also be designed to ensure the best disposal of hazardous materials in them.

- Municipalities should be part of the industry-provincial discussions to minimize the solid waste industry contributes to the waste stream.

- The province should encourage the private sector's efforts to collect hazardous waste generated by its products before this reaches the municipal waste management system.

3.6 Ontario Funding Programs

- The MOE should provide funding which reflects a "4Rs" waste minimization hierarchy of reduction, reuse, recycling and recovery of energy-from-waste. At present, most of its funding is for recycling activities, which are third in the hierarchy. AMO believes provincial money and effort would be more effective in decreasing the solid waste stream if the province promoted and financed reduction and reuse before recycling.

- The MOE should improve its funding programs by:

  - telling municipalities how much money is in a particular fund, and when that money has been depleted;

  - instituting an announced time limit in which to reply to municipalities;

  - increasing the amount of funding in the total package.

- In the section, "Progress Towards a Sustainable System - Planning", the MOE says comprehensive planning is currently funded 50 per cent through the MOE's Waste Management Master Planning Program. The province should include all municipal costs in this funding. Some costs, such as legal costs, are presently excluded.

- The province should recognize that the solution to this program will ultimately require multi-stakeholder funding and not just public funding - either provincial or municipal.

3.7 Ontario Waste Diversion Targets

- In March 1989, the Minister of Environment announced by press release that Ontario should divert 25 per cent of its waste by 1992 and 50 per cent by the year 2000. AMO believes the Ontario government should develop generic guidelines relative to waste diversion for municipalities. It has asked the province to adopt and publish an official policy, or pass legislation which formally enshrines its provincial waste diversion goals, and to develop methods to record progress toward these goals. AMO has also asked the province to develop, in concert with municipalities, implementation guidelines to meet these targets and to specify what percentage of the waste diversion goal for which it will take exclusive responsibility.

- The province should also develop some methodology for measuring progress toward these goals. At this point, it is unclear to municipalities what the base is for measuring this progress.

3.8 Packaging

- The federal and provincial governments should regulate firm dates by which the National Packaging Protocol's targets must be met by the private sector. Then it should enforce compliance.

3.9 Planning and Approvals Process

- The province should reconcile the waste management master plan process with the environmental assessment process, and then create one process which works. The difficulties with both of these processes have been noted in the first AMO waste management report, <u>The Waste Management Planning and Approvals Process</u>. With both processes, however, the province should provide more consistency in

setting and enforcing standards as well as guidelines and policies on all aspects of the waste management planning and approvals process. This is important because Ontario municipalities have experienced many conflicts in both the development of master plans and preparation for the Environmental Assessment process.

An AMO/MMA/MOE implementation committee is developing an implementation plan for the recommendations noted in this first AMO report, The Waste Management Planning and Approvals Process. But one important change would be for the province to streamline the Environmental Assessment process and provide generic models. The province should place a high priority on these areas because the current processes are inefficient, time-consuming and expensive for municipalities.

- The province should provide the provincial staff support for developing master plans as it indicates it will in the section, "The Decade Ahead".

- As indicated in the section, "The Decade Ahead - Planning", the province should immediately release its guidelines for helping municipalities through the master plan process.

- In the section, "The Decade Ahead - Planning", the MOE refers to EAPIP - the Environmental Assessment Program Improvement Process. AMO notes that municipalities are concerned that the province may consider EAPIP as the solution to waste management problems. AMO advises the province not to view EAPIP in this light as it was never intended to resolve all of the waste management problems.

3.10 Public

- The province and federal governments should provide more specific information on areas in which the public can reduce its solid waste generation to the fullest degree.

- The province should provide more information to employers to help them develop "3Rs" programs for their premises.

- The province should obtain more information about the best way to operate the public participation process. This information, along with guidelines, should be made available to municipalities. The parameters of public participation, and a definition of how much public participation is considered necessary, would also be helpful for municipalities.

3.11 Research and Development

- The federal government should conduct more research and development projects for environmental issues and technologies which cross provincial and international boundaries. Information from these projects should then be disseminated to municipalities.

- The MOE document says the federal government should "support" research and development of new and innovative "4Rs" technologies and market development. It then says the provincial government should "promote" this research and development. But MOE does not state that either the federal or the provincial government should "do" research and development. Both government levels should carry on this work in order to make the proper progress in this area. Information on the results, as well as acceptable technologies, should then be made available to municipalities so they do not all have to research the same area.

- The Canadian Council of Ministers of the Environment (CCME) should identify some common topics which should be researched and applied on a national scale.

3.12 Statutory Authority

- AMO has already asked the province to clarify

municipalities' statutory authority in the "4Rs" areas because municipalities believe the current legislation does not provide them with the authority for many "4Rs" activities. AMO, MOE and the Ministry of Municipal Affairs representatives now are working in an implementation committee to develop an implementation plan for AMO's recommendations in this area. However, this must be a legislative priority for the province so municipalities have the authority they need to carry out an integrated waste management system.

- In the section, "Everyone Has a Role - Municipalities", the MOE says municipalities have "assumed" primary responsibility for managing municipal solid waste. MOE should note that municipalities were "given" these tasks under the Municipal Act.

- Municipalities would also like the province to recognize that in some municipalities, the private sector handles up to 100 per cent of the waste which the MOE document has identified as "municipal" solid waste.

- In the section, "Everyone Has a Role - The Provincial Government", AMO agrees that the provincial legislation must be amended to clarify waste management authority for county and regional municipalities. Other areas which also need clarifying have been spelled out in the AMO waste management reports. AMO also urges the province to define the role of private operators in solid waste management.

3.13 Waste Producers

- AMO believes all levels of government, the private sector and the public should be involved in diverting waste. It presents some ways of achieving this, plus some concerns about what now is being done by some of these sectors, in its third waste management report, Municipal Solid Waste Management: Whose Problem Is It? (August 1990). It recommends the province refer to this document for further information.

4 COMMENTS ON SPECIFIC SECTIONS OF THE MOE DISCUSSION PAPER

In this section, AMO is offering the MOE detailed comments about specific sections of the MOE discussion paper, Towards a Sustainable Waste Management System . In the section, "Purpose of the Discussion Paper":

- the MOE has inappropriately assumed all residential, industrial, and commercial waste is managed by municipal authorities. Half of that waste is managed by private rather than municipal authorities, and municipal authorities have no control over these collection, processing and disposal systems.

- the MOE needs a clearer definition of "waste producers", and it should note that it is the private sector producers who produce waste and not the consumers who use the products.

In the section, "Introduction: The Waste Management Challenge" AMO agrees that:

- uncontrolled growth of waste generation must be checked and reversed;

- dependence on disposal must be replaced by a full range of conservation and disposal alternatives;

- all existing and new waste management facilities should be designed, operated and maintained to protect human health and the environment;

- facility standards need periodic review.

In the section, "Ontario's Goal: An Environmentally and Financially Sustainable Waste Management System":

- the MOE should clarify which framework it means - the master plan or Environmental Assessment process. Both are very flawed, as AMO has noted in its first waste management report, The Waste Management Planning and

Approvals Process.

AMO now serves on an AMO/MOE/Ministry of Municipal Affairs implementation committee which is developing an implementation plan for this report's recommendations. AMO hopes that once the province receives these reports it will implement the plans for improving these areas. This should be done in consultation with municipalities and as soon as possible.

In the section, "The Principles of a Sustainable Waste Management System":

- AMO notes that in principle three the MOE may have encouraged innovative ideas, but it has not developed proven technologies.

- the MOE should clarify what prices are to be set for waste producers. Municipalities already set tipping fees for waste.

In the section, "Everyone Has A Role":

- the province should clarify what regulations now exist for solid waste diversion since municipalities are not aware of any. The province should also clarify what regulations it is considering for implementation. AMO would appreciate the opportunity to comment on these before they are enacted.

In the section, "Everyone Has a Role - Municipalities":

- the province should realize municipalities are already integrating many waste management services, particularly in the "4Rs" areas. One of the AMO/MOE/MMA implementation committees is studying ways to offer guidance to municipalities to further help them. The province should realize that municipalities cannot integrate the waste management services for areas which are not under their jurisdiction. This is especially true for private enterprises.

- AMO is pleased the province has been working with municipalities in the implementation of AMO's first two waste management reports. We hope to continue to build on this work to address

the problems and concerns in this area and to achieve a better waste management system for Ontario.

In the section, "Everyone Has a Role - The Private Sector":

- the province should clarify what it means by "rules of practice" and "common '3Rs' opportunities". It should explain how the rules would be enforced and how this would support markets for recycled products. The province should also note that market development is critical to the success of many programs.

In the section, "Everyone Has a Role - The General Public":

- the federal government's Environmental Choice "EcoLogo" program should be expanded. It should also include a label which indicates whether a material should be reused, recycled, treated as a hazardous waste, or disposed of in an environmentally safe manner. This would increase consumer awareness and participation.

In the section, "Everyone Has a Role - The Federal Government":

- the federal government should help to develop markets for recyclable materials and mechanisms to ensure those markets. It should also promote reduction and reuse of waste.

- the federal government should provide increased funding to those agencies which are carrying out programs of national significance related to solid waste.

In the section, "Everyone Has a Role - The Provincial Government":

- the Ontario government should develop and implement material use and procurement policies which reflect the "4Rs" waste management hierarchy. To date, much of its work has been on recycling.

  The province should also immediately extend its

material use and procurement policies and recycling programs to all buildings it occupies as well as to all provincial ministries, agencies, boards and crown corporations.

The province should consider co-tendering with municipalities for projects which would assist public agencies in meeting waste reduction targets. The province should also share this information with others, particularly municipal governments, so they can use it as a model.

- the province should provide more technical assistance, particularly for small municipalities which do not have the staff to carry out the same research and development work as larger municipalities.

In the section, "Municipal Solid Waste Management and Financing":

- the province should explore the subject of centralized municipal composting and centralized composting facilities before it promotes these in a comprehensive way. The province should also be aware - and rectify the problems now associated with the fact that - the technology for these is not clear, the costs are high, and the standards are not yet available.

In the section, "The 3Rs of Waste Management":

- the province should release the results of the composting pilot projects it has conducted. It should further research the home composting area.

- the province should clarify who it is going to audit. It appears from the document that it may be industry.

5 CONCLUSION

The Association of Municipalities of Ontario appreciates the opportunity to comment on the Ministry of Environment's discussion paper, Towards a Sustainable Waste Management System. It hopes such municipal input into the provincial work in the waste management area will lead to further co-operation in developing the best way to manage this very complex area of joint responsibility and shared concern. This is important because waste management is not entirely a municipal or provincial responsibility.

AMO also urges the province to refer to AMO's waste management reports: The Waste Management Planning and Approvals Process (March 1989), The Municipal Waste Abatement Strategy (November 1989), and Municipal Solid Waste Management: Whose Problem Is It? (August 1990). These reports will provide more extensive municipal comments on the waste management system and municipalities' concerns and activities in this area.

Appendix A - Acknowledgments

The Association of Municipalities of Ontario would like to thank the members of its Ad Hoc Waste Management Committee who volunteered their time to produce this document. The members of the team were:

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91-12 AMO's Response to the 1991 Ontario Budget

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